

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION**

ROBIN LEE LEGG AND BASIL R.	)	C.A. NO. 0:24-CV-04165-MGL
LEGG, JR.,	)	
	)	
PLAINTIFFS,	)	
	)	
vs.	)	<b>DEFENDANTS' RULE 26(A)(2)(B)</b>
	)	<b>IDENTIFICATION</b>
PETERBILT OF ATLANTA, LLC, TAB	)	<b>OF EXPERTS</b>
TRUCKING, INC., AND TIMOTHY	)	
EARL ADAMS,	)	
	)	
DEFENDANTS.	)	
	)	

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Pursuant to Rule 26(a)(2)(B), Federal Rules of Civil Procedure, Defendants Tab Trucking, Inc. Timothy Earl Adams, and Peterbilt of Atlanta certify that the written report prepared and signed by the expert below have been disclosed to all other parties and that the reports comply with the requirements of Rule 26(a)(2)(B). The Defendants Tab Trucking, Inc., Timothy Earl Adams, and Peterbilt of Atlanta, Inc. reserve the right to supplement the reports as required by Rule 26(e), if necessary, as discovery progresses in this matter.

In addition to any experts identified by the Plaintiffs Robin Lee Legg and Basil R. Legg, Jr., all witnesses identified in discovery, and those individuals identified in Plaintiffs' medical records, and Plaintiffs' medical providers, the Defendants identify the following retained experts:

- a. P. Douglas deHoll, M.D.  
Juris Medicus  
10101 Reunion Place  
Suite 100  
San Antonio, TX 78216

Dr. deHoll is an orthopedist. Dr. deHoll's report is being provided to all counsel of record.

Dr. deHoll based his opinions on his own investigation and his examination of the following: discovery exchanged to date; deposition testimony of the Plaintiff Robin Legg; Plaintiff Robin Legg's lost wage information; Plaintiff Robin Legg's medical records; Plaintiff Robin Legg's discovery responses, the testimony of witnesses and parties and, his own expertise, training, education and background.

Dr. deHoll will utilize as exhibits any and all pleadings, documents, photographs, medical records and bills, medical reports, and other information produced (or to be produced) by all parties to this litigation, and any and all documents, reports, photographs and other information gathered by him during the course of his review.

Dr. deHoll's qualifications and publications, fee schedule and a listing of cases for which he has been a witness are attached.

#### GENERAL RESERVATIONS

Defendants reserve the right to call undesignated rebuttal expert witnesses whose testimony cannot reasonably be foreseen until the presentation of evidence against Defendants Tab Trucking, Inc., Timothy Earl Adams, and Peterbilt of Atlanta, LLC.

Defendants anticipate that some of the fact witnesses and/or expert witnesses disclosed will be called upon to testify at trial by videotape and others may be called upon to testify live at trial.

Defendants reserve the right to supplement the above designations based upon further discovery and productions.

Defendants reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate the same as a consulting expert who cannot be called by opposing counsel.

Defendants reserve the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material issues of fact, and which would not violate any existing court order or the Federal Rules of Civil Procedure.

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Dated: November 27, 2024